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REMARKS

This amendment is responsive to the Office Action mailed February 17, 2006. All rejections of the office action are respectfully traversed in view of the amendments and remarks herein. Reconsideration is requested.

Claims 1-34 are pending.

Claims 1-34 stand rejected.

Claim 2, 3, 18, 19, 30, and 33 have been canceled.

Claims 1, 4-6, 17, 20-22, 31-32 and 34 have been amended.

Claims 35-38 have been added.

Claims 1, 17, 31, 32, 34 and 35 are independent.

The Office Action objects to the length of the Abstract. The abstract has been herein amended accordingly.

The Office Action rejects claims 1-34 under 35 U.S.C. 101 based on the proposition that the claims are directed to non-statutory subject matter. Claim 1 has been herein amended accordingly to recite a computer program product having computer program code embodying computer program instructions encoded on a computer readable medium for performing a method of organizing and generating report data. Further, claims 1, 17, 31, 32 and 34 have been amended to recite a report renderable on a graphical user output device such as a display screen or printer output. Accordingly, the rejection under 35 U.S.C. 101 is deemed overcome and it is respectfully requested that it be withdrawn in view of these amendments.

The specification has been amended to correct several minor grammatical inconsistencies.

The Office Action rejects claims 1-34 based on Bowman-Amuah, U.S. Patent No. 6,615,253 (Bowman '253) in view of Bata, U.S. Patent No. 6,901,403 (Bata '403). For the reasons discussed further below, the Bowman system differs from the present claims because the Bowman system bundles all data into

a data structure for transmission over the network (col. 2. lines 25-30). In contrast, the claimed invention segregates (separates), rather than bundling (combining), the data during first and second passes. The disclosure provided by Bata merely adds XML representation of normalized data, as Bata teaches a virtual file system for accessing and combining heterogeneous data sources, (col. 4, line 65-col. 5, line 4), of which one may be XML (col. 5, lines 29-39). Thus, Bata likewise teaches away from Applicant's claims because Bata teaches combining and aggregating data sources, not segregating the data during first and second passes. Further, one skilled in the art would not look to Bata '403 to modify Bowman '253 because Bowman is concerned with network transport, focusing on remotely accessible nodes, while Bata is concerned with a file system, a locally managed arrangement of data in an immediately accessible storage device.

A brief synopsis of an exemplary configuration of Applicant's claimed invention may be beneficial. The presently claimed invention performs a first pass to identify a subset of applicable records by examining a portion of each of the retrieved records. Having identified the operating set of candidate records, the second pass then processes the records (entries) by retrieving only those records needed to satisfy a report query, according to the output criteria. The entire set of records need not be retrieved in order to generate the desired report query, thus saving memory.

The Office Action suggests that Bowman '253 teaches "determining an output criteria...for inclusion in a report" and "parsing, in a first pass...set of data." The claimed first pass is for eliminating data records, as selectively qualified by the output criteria, described in the specification from p. 11, line 25-p. 12, line 10. In contrast, the Bowman first pass is for bundling "all of the data" (col. 2:25). The present system determines the output criteria for eliminating records from the candidate set to be used in the resulting output report. The resulting first pass performs this action of isolating, or segregating, entries

(records) for the output report. Therefore, while the claimed first pass is directed to reducing entries (data), Bowman '253 is directed to combining (bundling) data.

The Bowman '253 system, rather, gathers all records needed for the report in entirety (110:41-43), and does not limit the "collect the information" operation to only those fields needed to identify report records. In contrast, the claimed first pass retrieves only a subset of fields for identifying entries to be retrieved in full during the second pass. Thus, Bowman does not show, teach, or disclose determining an output criteria applicable to a set of data, as recited in Claim 1. The claimed output criteria is operable to compute a subset for the report. Further, Claim 1 has been amended with the subject matter of claim 3, to further clarify that the output criteria includes a "selection criteria indicative of output records for inclusion in the candidate entries" for the report, typically about a screen's worth of records (16:29-30).

Claim 17, reciting apparatus claims having similar features as claim 1, has been similarly amended with the subject matter of claims 18 and 19, and claims 18 and 19 cancelled. Claim 32, also rejected on similar grounds, has been similarly amended.

Bata '403 does not show, teach, or disclose a first and second pass as claimed in Claim 1. The cited portions of Bata '403 discuss parsing and retrieval of normalized data based on fields, however does not show, teach, or disclose a first pass identifying report records based on a subset of fields, and a second pass gathering the identified records to be utilized in the reports, as recited in Claim 1. Further, Claim 1 has been amended with the subject matter of Claim 2, to clarify that the claimed second pass omits records from outside the candidate set needed for the report, to further clarify and distinguish applicant's claimed invention. Such omission is to enable very large data sets, which may be too large to load into memory all at once, to be effectively processed. Claim 37 has been herein added to clarify this feature by reciting that the parsed records (entries) in the first pass are excessively large for concurrent memory residence, and Claim 38 added to recite that the parsed records (entries) of the second pass

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require substantially less memory than the first pass so as to be stored simultaneously in memory. Both features are discussed in further detail at page 15, lines 15-19 and page 17, lines 12-19, respectively. Independent claim 31, rejected on similar grounds, has been similarly amended.

Claim 35 has been herein added, including features of claims 1-5, to further clarify the features of retaining selection and arrangement fields during the first pass, and that the selection criteria corresponds to a report of a screen of data (16:29-30).

Further, neither Bowman nor Bata show, teach, or disclose, in any manner, the callback feature employed by particular configurations of applicant's invention, as discussed at page 15, line 29-page 16, line 7. Claim 36 has been herein added, dependent from claim 35, and further including features of claims 12-14 reciting callback operations, as discussed at page 18, line 24 – page 19, line 9.

Therefore, it is respectfully submitted that applicant's claimed invention is not shown, taught or disclosed, alone or in combination, by either Bowman '253 or Bata '403 because Bowman and Bata both suggest combining and aggregating data sets while the present claims teach a system that omits and reduces data set entries for processing in limited memory environments. Further, even if one were to combine Bowman with Bata, the present invention would still not be realized because the result does not mitigate memory demands. Specifically, the Bowman and Bata combination does not show, teach or disclose the claimed parsing, in a second pass, the computed subset of candidate entries, and omitting from a memory, in the second pass, entries in the parsed plurality of entries outside the candidate set, as recited in amended claim 1.

Based on the foregoing remarks and amendments, it is respectfully submitted that all claims in the case are now in condition for allowance and it is respectfully requested that the rejection under 35 U.S.C. 103(a) be withdrawn. As the remaining claims depend, either directly or indirectly, from claims 1, 17 and 35, it is submitted that all claims are now in condition for allowance.

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Applicant(s) hereby petition(s) for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3735.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 616-9660, in Westborough, Massachusetts.

Respectfully submitted,



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